

LAGOMARSINO LAW

ANDRE M. LAGOMARSINO, ESQ. (#6711)

CORY M. FORD, ESQ. (#15042)

3005 W. Horizon Ridge Pkwy., #241

Henderson, Nevada 89052

Telephone: (702) 383-2864

Facsimile: (702) 383-0065

aml@lagomarsinolaw.com

cory@lagomarsinolaw.com

*Attorneys for Plaintiff Ti'a Joseph***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

TI'A JOSEPH, an individual;

Plaintiff,

v.

ELITE MEDICAL CENTER, LLC, a
Domestic Limited-Liability Company;

Defendant.

Case No.: 2:22-CV-00703-JAD-NJK

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION TO COMPEL
ARBITRATION (ECF NO. 19)****(Second Request)**

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

Plaintiff TI'A JOSEPH ("Plaintiff") and Defendant ELITE MEDICAL CENTER, LLC ("Defendant"), by and through their counsel of record, hereby stipulate and agree to take that the court approve the extension of time for Plaintiff to file her response to Defendant's Motion to Compel Arbitration [ECF No. 19] filed on July 8, 2022. Plaintiff's response is currently due on August 5, 2022 per the Court's Order [ECF No. 21]. This is the second request for an extension of time to oppose the Motion.

Plaintiff's counsel, which is a small firm of only two attorneys, is currently preparing for a two-week long trial in the United States District Court, District of Nevada, Case No.2:17-cv-00880-JCM-VCF, which will be commencing on August 8, 2022. The partner of the firm is lead trial counsel in that case. The associate attorney has also been assisting in preparation for that trial and has to devote more time than was anticipated to assisting in the trial. Additionally, Plaintiff's firm has been short staffed, as two of its law clerks were out the entire month of July preparing and taking the Nevada State Bar. The partner of firm and office manager also were out of office during parts of

July after testing positive for COVID-19. Additionally, the firm's head paralegal just recently returned from maternity leave. As a result, Plaintiff's firm has been significantly hindered in its ability to devote adequate time to drafting a response due to the extensive trial preparations and being short staffed. The parties aver that this is the second stipulation for an extension of time with respect to this Motion, that the requested extension will not alter any date previously set by the Court in this matter, and this request is made in good faith and not for purposes of delay.

IT IS HEREBY STIPULATED AND AGREED that Plaintiff's Opposition to Defendant's Motion to Compel Arbitration shall be due **August 15, 2022**.

DATED this 4th day of August 2022

DATED this 4th day of August 2022

/s/ Cory M. Ford

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Andre M. Lagomarsino, Esq. (#6711)

Cory M. Ford, Esq. (#15042)

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Telephone: (702) 383-2864

Attorneys for Plaintiff Ti'a Joseph

/s/ Crane M. Pomerantz

CLARK HILL PLLC

Crane M. Pomerantz (#14103)

Nicholas M. Wiczorek (#6170)

3800 Howard Hughes Parkway, Suite 500

Las Vegas, Nevada 89169

Telephone: (702) 697-7545

Attorneys for Defendant Elite Medical Center, LLC

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: August 11, 2022

LAGOMARSINO LAW
3005 West Horizon Ridge Parkway, #241, Henderson, Nevada 89052
Telephone (702) 383-2864 Facsimile (702) 383-0065